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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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13

14 UNITED STATES OF AMERICA,

15 No. CR 14-00285-JST

16 Plaintiff,

17 v.
18 AMENDED STIPULATION AND
19 ~~PROPOSED~~ ORDER TO CONTINUE
20 CHANGE OF PLEA FROM FEBRUARY
21 13, 2015 TO MARCH 27, 2015 AND TO
22 EXCLUDE TIME UNDER THE SPEEDY
23 TRIAL ACT

24 ALICIA MITTS,
25 Defendant.

26 Date: February 13, 2015
27 Time: 9:30 a.m.
28 Court: Hon. Jon S. Tigar

29
30 The above-captioned matter is set on February 13, 2015 at 9:30 a.m. before the Hon. Jon
31 S. Tigar for a change of plea. The parties previously filed a stipulation requesting that the Court
32 vacate this date and reset the matter on March 6, 2015. Because the Court is unavailable on
33 March 6th, this amended stipulation is filed requesting that the matter be reset to March 27, 2015
34 at 9:30 am for a change of plea. The parties further request that the Court exclude time through
35 March 27, 2015 to allow for effective preparation and continuity of defense counsel pursuant to
36 18 U.S.C. §§3161 (h)(7)(A) and (h)(7)(B)(iv).
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1 The prosecution is considering diversion in Ms. Mitts' matter. To this end, the defense is
2 in the process of compiling documentation in support. Currently, the defense has obtained
3 medical records and a report after examination by an expert. Counsel for the defendant is
4 awaiting one additional letter from an expert. The letter should be written within the next 2
5 weeks and the matter should be ready for disposition on March 27th.
6

7 The parties agree that the ends of justice served by granting the continuance outweigh the
8 best interests of the public and defendant in a speedy trial.
9

10 SO STIPULATED.
11

13 Dated: February 11, 2015

_____/S/_____
Kevin Barry
Assistant United States Attorney

17 Dated: February 11, 2015

_____/S/_____
Camellia Baray
Attorney for Ms. Mitts

1 For good cause shown, the change of plea currently set for February 13, 2015 is
2 continued to March 27, 2015 at 9:30 a.m., and time between February 13 and March 27, 2015 is
3 excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§3161(h)(7)(A) and (h)(7)(B)(iv).
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5 IT IS SO ORDERED.
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8 DATED: February 12, 2015
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